

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re TALKSPACE, INC. SECURITIES	:	Civil Action No. 1:22-cv-00163-PGG
LITIGATION	:	
	:	<u>CLASS ACTION</u>
_____	X	
		LEAD COUNSEL’S NOTICE OF MOTION AND MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND EXPENSES AND AWARDS TO PLAINTIFFS PURSUANT TO 15 U.S.C. §78u-4(a)(4)

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Counsel will move this Court on October 30, 2023, at 10:00 a.m., before the Honorable Paul G. Gardephe at the Thurgood Marshall United States Courthouse, Courtroom 705, 40 Foley Square, New York, New York 10007, or as soon thereafter as the parties can be heard, for an entry of order, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (i) awarding attorneys’ fees; (ii) paying litigation expenses incurred in prosecuting the Actions; and (iii) granting awards to Plaintiffs.¹

This motion is based on: (i) the Memorandum of Law in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Expenses and Awards to Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4); (ii) the Joint Declaration of Lawrence M. Rolnick and Evan J. Kaufman in Support of: (1) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (2) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Expenses and

¹ Unless stated otherwise, all capitalized terms used herein have the meanings set forth and defined in the Stipulation of Settlement (ECF 84).

Awards to Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declarations of Plaintiffs; (iv) the Declaration of Ross D. Murray; (v) the Declarations of Plaintiffs' Counsel; (vi) the Stipulation of Settlement; and (vii) all other proceedings herein.

A proposed order will be submitted with Plaintiffs' reply submission on or before October 23, 2023.

DATED: September 25, 2023

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on September 25, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Evan J. Kaufman

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Mailing Information for a Case 1:22-cv-00163-PGG Baron v. Talkspace, Inc. et al**Electronic Mail Notice List**

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)